

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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Retail Access Optimization Initiative, 2011 )  
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Docket No. N2011-1

MOTION OF THE  
CENTER FOR STUDY OF RESPONSIVE LAW  
FOR LATE FILING OF NOTICE OF INTERVENTION  
(August 26, 2011)

The Center for Study of Responsive Law was founded by Ralph Nader in 1968 as his principal office. The Center is a nonprofit organization, based in Washington, D.C. It has sponsored a wide variety of books, organizing projects, litigation, and has hosted hundreds of conferences focusing on government and corporate accountability. In that time, the Center has produced a report, a book, and a law review concerning the U.S. Postal Service.<sup>1</sup>

One of the Center's primary goals is to empower citizens. The Center focuses on a variety of environmental, consumer and worker health and safety issues. The Center has conducted research and educational projects to encourage the political, economic, and social institutions of this country to be more aware of the needs of the citizen-consumer. The Center thus has a substantial interest in the issues raised by the retail access optimization initiative and the proposed changes.

The Center for Study of Responsive Law hereby moves for the late acceptance of its notice of intervention in the above-captioned proceeding. The Center seeks to intervene at this time because of an observed lack of participation by consumer and civic groups in the proceeding. No party will be prejudiced by the late filing of this notice, and the late filing of this notice will not cause any delay in the proceedings.

Respectfully submitted,

Jeffrey Musto  
Center for Study of Responsive Law

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<sup>1</sup>Conkey, Kathleen. "Postal Precipice: Can the United States Postal Service Be Saved?" Center for Study of Responsive Law. Published March 1, 1983. 515 pages.

Belluck, Joseph W. "Comment: Increasing Citizen Participation In U.S. Postal Service Policy Making: A Model Act to Create a Post Office Consumer Action Group." Winter, 1994, 42 Buffalo L. Rev. 253

Shaw, Christopher W. "Preserving the People's Post Office." Published by Essential Books 2006. 250 pages.

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